



7373 Gateway Boulevard  
Newark  
California  
CA94536

Mr David Hurlin  
Environmental Protection Agency  
Compliance Division  
Light-Duty Vehicle Center  
2000 Traverwood Drive  
Ann Arbor, MI 48105

29 April 2020

Dear Mr. Hurlin

**Testing exemption request under 40 CFR § 85.1705**

I am writing on behalf of Lucid Motors USA Inc, the doing business name of Atieva Inc..

**Ex. 4 CBI**

In order to use **Ex. 4 CBI** we are applying for a testing exemption in accordance with 40 CFR, Part 85, section 1705.

**Make, Model, Year and Location of Production**

The vehicles in question are Lucid Air sedan prototypes, manufactured in 2020 in California. Hence, they are domestically-produced vehicles.

**Purpose of Beta 2 vehicles**

The purpose of the **Ex. 4 CBI**

**Ex. 4 CBI**

**Description of need for exemption**

As Lucid Motors currently

Ex. 4 CBI

# Ex. 4 CBI

**Test Program Scope**

It is estimated that the Beta 2 vehicles will be used for up to 1 year, although some vehicles may be kept as reference vehicles and used for a longer period. In this case, Lucid Motors will re-apply for exemptions for those specific vehicles before the expiry of the exemption period.

Records regarding the purposes of testing, test sites, and duration of tests for each vehicle will be recorded by the Lucid Motors fleet manager and made available for EPA inspection on request.

**Description of vehicles**

Lucid Motor vehicles are all fully electric and therefore no emissions control equipment is required or fitted. A list of all vehicle identification numbers and use for the Beta 2 fleet is below:

<b>Ex. 6 Personal Privacy (PP)</b>	Safety
	Safety
	LV
	Safety
	Safety
	Safety
	Safety
	Safety
	Safety
	Safety
	Safety
	Safety
	Durability
	Safety

Ex. 6 Personal Privacy (PP)

Safety  
NVH  
Safety  
Body  
Body  
Safety  
Safety  
Durability  
Safety  
Suspension  
Safety Buck  
Safety Buck  
Safety Buck  
Safety  
Safety  
Thermal  
Safety  
Safety  
Powertrain  
Safety  
Safety  
Safety  
NVH  
ADAS  
ADAS  
ADAS  
ADAS  
Internal development

<div>Ex. 6 Personal Privacy (PP)</div>	<div>Internal development</div> <div>Safety</div> <div>Safety</div> <div>Safety</div> <div>Safety</div>
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Each vehicle is wholly owned by Lucid Motors, though some vehicles may, in some cases, be operated by suppliers contracted by Lucid Motors.

#### Requested duration of exemption and final disposition of vehicles

Lucid Motors requests that a one-year exemption be granted.

As we approach the end of that period, we will either apply for an extension to this exemption or dispose of the vehicles in a manner according with EPA policies.

Thank you in advance for your prompt attention to this matter. If you should have any questions regarding this request, please contact me as soon as possible.

Yours sincerely

Ex. 6 Personal Privacy (PP)

Head of Global Homologation

Ex. 6 Personal Privacy (PP)